



State of Vermont

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June 19, 2003

LINDA REEVES
JOHNSON AND DIX FUEL CORPORATION
240 MECHANIC STREET
LEBANON, NH 03766

Re: Sites Management Activities Complete, Johnson and Dix Ludlow Bulk Facility
SMS Site #96-2075, Ludlow, Vermont

Dear Ms. Reeves:

The Sites Management Section (SMS) has reviewed the September 30, 1997 report titled, "*Site Monitoring, Ludlow Bulk Storage Facility, Dug Way Road, Ludlow, Vermont*" prepared by Dufresne-Henry (D-H) for work conducted at the above referenced site. The SMS has also reviewed information contained in the site file. With this information, the SMS can now make the following conclusions:

- From August 13 to 15, 1996 one 17,000 gallon and one 500 gallon kerosene, one 17,000 gallon diesel, and four 25,000 gallon #2 fuel oil underground storage tanks (UST) were removed from the Johnson & Dix property in Ludlow.
- During the UST removals, soils surrounding the USTs were found to be contaminated with petroleum compounds at concentrations above SMS guideline levels, as measured with a photoionization detector (PID). The maximum PID reading was 286 parts per million (ppm); strong odors and soil staining were also reported. Groundwater was encountered at 10' and no evidence of gross groundwater contamination (free product or sheens) was observed. All contaminated soil was backfilled during the installation of replacement USTs. Additional investigation of the UST removals was required by the SMS.
- Thirteen monitor wells have been installed on site. Due to site activities these were not all usable. On December 20, 1996 four monitor wells (MW-1, -9, -10, and -12) were sampled for volatile organic compounds (VOCs) by EPA Method 8020 and total petroleum hydrocarbons (TPH) by EPA Method 8100M. No groundwater contamination was detected.
- In August 1997 monitor wells MW-4, -5, -6 and -8 were repaired and on September 4 seven monitor wells were sampled for VOCs and TPH. MW-4 was sampled on September 8. No groundwater contamination was detected.

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- The nearest surface water, is the Black River, approximately 160 feet down gradient to the north west. This was inspected for sheens and other evidence of contamination; no contamination was observed. No other sensitive environmental receptors were identified.
- The area is served by a municipal water supply, which is not at risk of contamination from this site. There is no building on site.
- No unacceptable risk to human health and the environment is present due to any residual contamination remaining in the ground from the removed USTs.
- The site groundwater monitoring wells were properly closed to eliminate possible conduits for contaminant migration into the subsurface. This closure involved removal of the protective well cover and filling the wells with a grout material to prevent fluid migration in the borehole and.

Based on the above, the SMS is assigning this site a Site Management Activity Completed (SMAC) designation. This SMAC designation does not release the Johnson & Dix Fuel Corporation of any past or future liability associated with the petroleum contamination onsite. It does, however, mean that the SMS is not requesting any additional work in response to the 1996 UST removals.

Sincerely,



George Desch, P.E.

Chief, Sites Management Section

CC: Ludlow Selectboard
Ludlow Health Officer
DEC Regional Office (via electronic mail)
Bruce Cox, P.E., Dufresne-Henry (via electronic mail)